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SAT-PDR-20020823-00161
Spacecom Satellite Communications Services
S.C.C. Ltd.

August 23, 2002

RECEIVED

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
455 12th Street, S.W.
Washington, D.C. 20554

AUG 23 2002

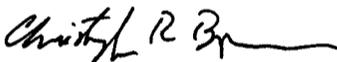
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Dortch:

On behalf of Spacecom Satellite Communications Services S.C.C. Ltd., enclosed please find an original and four copies of a Petition for Declaratory Ruling to add the AMOS-2 satellite at 4° W.L. to the Commission's Permitted Space Station List. Also enclosed is an additional copy, which we ask you to date stamp and return with our messenger.

Please do not hesitate to contact the undersigned with any questions you may have regarding this petition.

Sincerely,



Benjamin J. Griffin
Christopher R. Bjornson

Counsel for Spacecom Satellite
Communications Services S.C.C. Ltd.

Enclosures

Washington Boston New York Reston New Haven

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

AUG 23 2002

In the Matter of)
)
Spacecom Satellite Communications)
Services S.C.C. Ltd.)
)
Petition for Declaratory Ruling to Add)
Spacecom Satellite Communications)
Services Ltd. AMOS-2 Satellite)
At 4° W.L. to the Commission's)
Permitted Space Station List)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

SAT-PDR-20020823-00161

Spacecom Satellite Communications Services
S.C.C. Ltd.

To: International Bureau

PETITION FOR DECLARATORY RULING

Spacecom Satellite Communications Services S.C.C. Ltd. ("Spacecom"), by counsel and pursuant to Section 25.137 of the Commission's rules and the *DISCO II First Reconsideration Order*,^{1/} hereby respectfully requests that the Commission add the AMOS-2 satellite at 4° W.L. to the Commission's Permitted Space Station List, for the provision of services to and from the United States covered by the World Trade Organization's Basic Telecommunications Agreement ("WTO Basic Telecom Agreement").

Specifically, Spacecom requests that AMOS-2 be permitted to receive transmissions from U.S. uplink earth stations in the 13.75-14.5 GHz band and transmit to

^{1/} Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States, IB Docket No. 96-111, *First Order on Reconsideration*, FCC 99-325, 15 FCC Rcd 7207 (rel. Oct. 29, 1999) ("*DISCO II First Reconsideration Order*").

U.S. receive earth stations in the 11.45-11.7 band ("Ku-band").^{2/} To the extent U.S.-licensed earth stations have an "ALSAT" designation and communicate with AMOS-2 in the conventional Ku-band frequencies, such earth stations would be permitted to communicate with AMOS-2 without further authorization once AMOS-2 is placed on the Permitted Space Station List.^{3/}

A FCC Form 312 application, together with exhibits providing the information required under Sections 25.114 and 25.137 of the Commission's rules are attached hereto. Grant of this petition will serve the public interest by providing consumers with more alternatives in choosing communications service providers, reducing prices and facilitating technological innovation.

Spacecom will launch AMOS-2 to the 4° W.L. orbital slot in early 2003 to provide capacity for transatlantic communications services. Spacecom currently operates the AMOS-1 satellite at 4° W.L. with coverage of the Middle East and Central Europe. AMOS-2 will be coordinated with AMOS-1, and include coverage of the eastern United States as well as the Middle East and Europe. Grant of the instant petition will permit all U.S. Ku-band earth stations with an "ALSAT" designation to enjoy greater access to enhanced transatlantic facilities and services through expansion of Spacecom's space segment capacity made available for such services. As demonstrated in this petition and the accompanying attachments, AMOS-2 satisfies all legal and technical requirements for U.S. service.

^{2/} Spacecom does not seek authority to provide Direct-to-Home service, Direct Broadcasting Service or Digital Audio Radio service in the United States.

^{3/} Although AMOS-2 also will operate in the "extended" Ku-band frequencies (13.75-14.0 GHz and 11.45-11.7 GHz), Spacecom understands that any U.S. earth station wishing to transmit in the extended Ku-band uplink frequencies would need to modify its license on a case-by-case basis in order to obtain authorization to do so. In addition, proposed downlinks in the extended Ku-band would be for international services only, as permitted by the Commission's Rules.

I. AMOS-2 Meets the Requirements for Inclusion on the Permitted Space Station List.

In the *DISCO II First Reconsideration Order*, the Commission stated that it will grant a declaratory ruling request by a foreign satellite operator regarding provision of C-band and Ku-band service in the United States – and include the operator’s satellite on the Permitted Space Station List – where the request is accompanied by information demonstrating compliance with Section 25.137 of the Commission’s rules.^{4/} The Commission concluded that:

U.S. earth stations with ALSAT licenses should be permitted to communicate with any non-U.S. satellite just as easily as they communicate with any U.S.-licensed satellite, provided that those communications do not cause harmful interference to or require protection from adjacent satellite operations, and otherwise comply with *DISCO II*.^{5/}

The AMOS-2 satellite will fully comply with the requirements applicable to U.S. satellites and will not “cause harmful interference to or require protection from adjacent satellite operations.” Furthermore, this petition includes all of the information required under Sections 25.114 and 25.137 and other relevant parts of the Commission’s rules. Accordingly, Spacecom urges the Commission to grant the instant petition and include AMOS-2 on the Permitted Space Station List.

A. Section 25.137(a)

Section 25.137(a) requires an applicant seeking to operate with a non-U.S. licensed space station to submit as an exhibit to its Form 312 application a showing that U.S.-licensed satellite systems have effective competitive opportunities to provide analogous services in the country in which the non-U.S. licensed space station is licensed,

^{4/} *Disco II First Reconsideration Order*, 15 FCC Rcd at 7212, ¶ 10.

^{5/} *Id.* at 7214, ¶ 16.

and all countries in which communications with the U.S. earth station will originate and terminate.^{6/}

The AMOS-2 satellite will be owned and operated by Spacecom, an Israeli company. It will operate at the 4° W.L. orbital position, co-located with AMOS-1, already positioned in this position since May 1996 and marketed by Spacecom, pursuant to Israel's frequency assignment.^{7/} In its *DISCO II Order*,^{8/} the Commission established a rebuttable presumption in favor of entry by satellites licensed by other WTO members and certain IGO's to provide services covered by the U.S. commitments under the WTO Basic Telecom Agreement. In this case, the presumption in favor of entry is applicable because Israel is a WTO member^{9/} and a signatory to the WTO Basic Telecom Agreement^{10/} and because only fixed-satellite services are contemplated. To the extent these services are provided on extended Ku-band frequencies, they will comply with all FCC requirements.

B. Section 25.137(b)

Section 25.137(b) requires petitioners to submit, as an exhibit to their Form 312 applications, the legal, technical and financial information required of applicants seeking space station authorizations from the Commission, in accordance with Part 25 of the

^{6/} 47 C.F.R. § 25.137(a).

^{7/} Israel Ministry of Communication confirmation to Spacecom, MG (194) 6895 dated May 27, 2002.

^{8/} Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States, IB Docket No. 96-111, 12 FCC Rcd 24094 (1997) ("*DISCO II*").

^{9/} See World Trade Organization, *Members and Observers*, at http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm (Sept. 25, 2001) (providing a list of WTO members).

^{10/} See World Trade Organization, *Telecommunications Services: List of Commitments and Exemptions*, at http://www.wto.org/english/tratop_e/serv_e/telecom_e/telecom_commit_exempt_list_e.htm (Sept. 25, 2001) (providing a list of WTO Basic Telecom Agreement signatories).

Commission's rules.¹¹⁷ The technical information is provided in Attachment A to the Form 312. Information related to Spacecom's financial qualifications is provided in Attachment B to the Form 312, and information related to Spacecom's legal qualifications is provided in Attachment C to the Form 312.

1. Legal Qualifications

Spacecom's legal qualifications are set forth in the Form 312 and Attachment C. Spacecom meets all of the legal qualifications required by the Commission of space station licensees and will abide by all of the Commission's rules.

2. Technical Qualifications

Technical information for AMOS-2, as required by Sections 25.114 and 25.140(b) of the Commission's rules, is attached as Attachment A to Form 312. Coordination of AMOS-2 operations at 4° W.L. is in progress and should not prevent operation of AMOS-2 in the manner contemplated in this Petition. There are no Ku-band U.S. networks operating or proposed for operation in the vicinity of 4° W.L. Furthermore, AMOS-2 is fully consistent with the Commission's two-degree spacing policy.

3. Financial Qualifications

Because the satellite is not yet in orbit, financial information demonstrating the ability of Spacecom to construct, launch and operate the satellite for one year, as required under Sections 25.114(c)(17) and 25.140(b)(3)&(4) is attached as Attachment B to the Form 312.

II. Access to the U.S. Market for AMOS-2 Will Serve the Public Interest.

Access by all U.S. earth stations with an ALSAT designation to AMOS-2 would produce substantial public interest benefits. As stated above, AMOS-2 will enhance

¹¹⁷ 47 C.F.R. § 25.137(b).

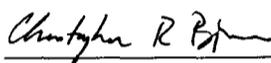
Spacecom's transatlantic offerings by providing U.S. earth stations operators with a greater range of space station service choices and more capacity. The expansion of capacity available to the U.S. market will stimulate lower prices, improve service quality, increase service options and foster technological innovation.

III. Conclusion

Therefore, for the reasons set out above, Spacecom respectfully requests that the Commission issue a declaratory ruling adding the AMOS-2 satellite to the Permitted Space Station List.

Respectfully Submitted,

**Spacecom Satellite
Communications Services S.C.C.
Ltd.**



Benjamin J. Griffin
Christopher R. Bjornson
**MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY AND POPEO, P.C.**
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004
(202) 434-7300

FCC 312 Main Form FEDERAL COMMUNICATIONS COMMISSION APPLICATION FOR SATELLITE SPACE AND EARTH STATION AUTHORIZATIONS	<small>Approved by OMB 3060-0678</small>	FCC Use Only File Number:
	<small>Est. Avg. Burden Hours Per Response: 11 Hrs.</small>	Call Sign:
		Fee Number:

APPLICANT INFORMATION

1. Legal Name of Applicant Spacecom Satellite Communications Services S.C.C. Ltd.		2. Voice Telephone Number 011-972-3-6134720	
3. Other Name Used for Doing Business (if any) AMOS Satellite Communications		4. Fax Telephone Number 011-972-3-6134723	
5. Mailing Street Address or P.O. Box Twin Towers I, 33 Jabotinsky Street ATTENTION: David Pollack		6. City Ramat Gan	8. Zip Code 52511
		7. State / Country (if not U.S.A.) Israel	
9. Name of Contact Representative (If other than applicant) Benjamin J. Griffin		10. Voice Telephone Number (202) 434-7300	
11. Firm or Company Name Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.		12. Fax Telephone Number (202) 434-7400	
13. Mailing Street Address or P.O. Box 701 Pennsylvania Avenue, N.W. ATTENTION: Benjamin J. Griffin		14. City Washington, D.C.	16. Zip Code 20004-2608
		15. State / Country (if not U.S.A.)	

CLASSIFICATION OF FILING

17. Place an "X" in the box next to the classification that applies to this filing for both questions a. and b. Mark only one box for 17a and only one box for 17b.			
<input type="checkbox"/> a1. Earth Station	<input type="checkbox"/> b1. Application for License of New Station	<input type="checkbox"/> b6. Transfer of Control of License or Registration	
<input checked="" type="checkbox"/> a2. Space Station	<input type="checkbox"/> b2. Application for Registration of New Domestic Receive-Only Station	<input type="checkbox"/> b7. Notification of Minor Modification	
	<input type="checkbox"/> b3. Amendment to a Pending Application	<input type="checkbox"/> b8. Application for License of New Receive-Only Station Using Non-U.S. Licensed Satellite	
	<input type="checkbox"/> b4. Modification of License or Registration	<input type="checkbox"/> b9. Letter of Intent to Use Non-U.S. Licensed Satellite to Provide Service in the United States	
	<input type="checkbox"/> b5. Assignment of License or Registration	<input checked="" type="checkbox"/> b10. Other (Please Specify): <u>Petition for Declaratory Ruling</u>	
18. If this filing is in reference to an existing station, enter: Call sign of station:		19. If this filing is an amendment to a pending application enter: (a) Date pending application was filed: (b) File number of pending application:	

TYPE OF SERVICE

20. NATURE OF SERVICE: This filing is for an authorization to provide or use the following type(s) of service(s): Place an "X" in the box(es) next to all that apply.

a. Fixed Satellite
 c. Radiodetermination Satellite
 e. Direct to Home Fixed Satellite
 b. Mobile Satellite
 d. Earth Exploration Satellite
 f. Digital Audio Radio Service
 g. Other (please specify) _____

21. STATUS: Place an "X" in the box next to the applicable status. Mark only one box.

a. Common Carrier
 b. Non-Common Carrier

22. If earth station applicant, place an "X" in the box(es) next to all that apply.

a. Using U.S. licensed satellites
 b. Using Non-U.S. licensed satellites

23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Mark only one box. Are these facilities:

a. Connected to the Public Switched Network
 b. Not connected to the Public Switched Network

24. FREQUENCY BAND(S): Place an "X" in the box(es) next to all applicable frequency band(s).

a. C-Band (4/6 GHz)
 b. Ku-Band (12/14 GHz)
 c. Other (Please specify) _____

TYPE OF STATION

25. CLASS OF STATION: Place an "X" in the box next to the class of station that applies. Mark only one box.

a. Fixed Earth Station
 b. Temporary-Fixed Earth Station
 c. 12/14 GHz VSAT Network
 d. Mobile Earth Station
 e. Space Station
 f. Other (Specify) _____

If space station applicant, go to Question 27.

26. TYPE OF EARTH STATION FACILITY Mark only one box.

a. Transmit/Receive
 b. Transmit-Only
 c. Receive-Only

PURPOSE OF MODIFICATION OR AMENDMENT

27. The purpose of this proposed modification or amendment is to: Place an "X" in the box(es) next to all that apply.

a -- authorization to add new emission designator and related service
 b -- authorization to change emission designator and related service
 c -- authorization to increase EIRP and EIRP density
 d -- authorization to replace antenna
 e -- authorization to add antenna
 f -- authorization to relocate fixed station
 g -- authorization to change assigned frequency(ies)
 h -- authorization to add Points of Communication (satellites & countries)
 i -- authorization to change Points of Communication (satellites & countries)
 j -- authorization for facilities for which environmental assessment and radiation hazard reporting is required
 k -- Other (Please Specify) _____

ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? If YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. §§ 1.1308 and 1.1311, as an exhibit to this application.

YES
 NO

A Radiation Hazard Study must accompany all applications as an exhibit for new transmitting facilities, major modifications, or major amendments. Refer to OET Bulletin 65.

ALIEN OWNERSHIP

29. Is the applicant a foreign government or the representative of any foreign government?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
30. Is the applicant an alien or the representative of an alien?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
31. Is the applicant a corporation organized under the laws of any foreign government?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
32. Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit, the identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.		

BASIC QUALIFICATIONS

35. Does the applicant request any waivers or exemptions from any of the Commission's Rules? If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
36. Has the applicant or any party to this application had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explanation of the circumstances.	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
37. Has the applicant, or any party to this application, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explanation of the circumstances.	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition? If Yes, attach as an exhibit, an explanation of the circumstances.	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If Yes, attach as an exhibit, an explanation of the circumstances.	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, addresses, and citizenship of those stockholders owning of record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer.		
41. By checking Yes, the undersigned certifies, that neither the applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
42a. Does the applicant intend to use a non-U.S. licensed satellite to provide service in the United States? If yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. § 25.137, as appropriate. If no, proceed to question 43.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station? <u>Israel</u>		

43. Description. (Summarize the nature of the application and the services to be provided).

The purpose of this application is to request addition of the AMOS-2 satellite at 4 degrees W.L. to the Permitted Space Station List in order to allow all U.S. Ku-band earth stations with ALSAT designation to uplink to the satellite in the conventional Ku-band uplink frequencies and receive transmissions from the satellite. Earth stations seeking to transmit in extended Ku-band frequencies would be required to obtain separate license modifications.

Exhibit No.	Identify all exhibits that are attached to this application.
Attachment A	Technical Information
Attachment B	Financial Information
Attachment C	Foreign Ownership Information

CERTIFICATION

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

44. Applicant is a (an): (Place an "X" in the box next to applicable response.)

- a. Individual
 b. Unincorporated Association
 c. Partnership
 d. Corporation
 e. Governmental Entity
 f. Other (Please specify) _____

45. Typed Name of Person Signing

David Pollack

46. Title of Person Signing

CEO and Managing Director

47. Signature

David Pollack

48. Date

August 14, 2002

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

FEDERAL COMMUNICATIONS COMMISSION FCC 312 - Schedule A (Place an "X" in one of the blocks below)				FCC Use Only	
<input type="checkbox"/> CONSENT TO TRANSFER OF CONTROL		<input type="checkbox"/> CONSENT TO ASSIGNMENT OF LICENSE			
<input type="checkbox"/> NOTIFICATION OF TRANSFER OF CONTROL OF RECEIVE ONLY REGISTRATION		<input type="checkbox"/> NOTIFICATION OF ASSIGNMENT OF RECEIVE ONLY REGISTRATION			
A1. Name of Licensee or Registrant			A2. Voice Telephone Number		
A3. Mailing Street Address or P.O. Box			A4. Fax Telephone Number		
ATTENTION:			A6. State / Country (if not U.S.A.)		A7. Zip Code
A5. City					
A8. List Call Sign(s) of station(s) being assigned or transferred					A9. No. of station(s) listed
A10. Name of Transferor/Assignor (if different than licensee or registrant)			A15. Name of Transferee/Assignee		
A11. Mailing Street Address or P.O. Box			A16. Mailing Street Address or P.O. Box		
A12. City	A13. State/Country	A14. Zip Code	A17. City	A18. State/Country	A19. Zip Code
A20. If these facilities are licensed, is the transferee/assignee directly or indirectly controlled by any other entity? If Yes, attach as an exhibit, a statement (including organizational diagrams where appropriate) which fully and completely identifies the nature and extent of control including: (1) the name, address, citizenship, and primary business of the controlling entity and any intermediate subsidiaries or parties; and (2) the names, addresses, citizenship, and the percentages of voting and equity stock of those stockholders holding 10 percent or more of the controlling corporation's voting stock.					
<input type="checkbox"/> YES <input type="checkbox"/> NO					
A21. If these facilities are licensed, attach as an exhibit, a complete statement setting forth the facts which show how the assignment or transfer will serve the public interest.					

CERTIFICATION

1. The undersigned, individually and for licensee, certifies that all attached exhibits pertinent to Schedule A and all statements made in Schedule A of this application are true, complete and correct to the best of his/her knowledge and belief. The undersigned also certifies that any contracts or other instruments submitted herewith are complete and constitute the full agreement.			
2. The undersigned represents that stock will not be delivered and that control will not be transferred until the Commission's consent has been received, but that transfer of control or assignment of license will be completed within 60 days of Commission consent. The undersigned also acknowledges that the Commission must be notified by letter within 30 days of consummation.			
A22. Printed Name of Licensee (Must agree with A1)	A23. Signature	A24. Title (Office Held by Person Signing)	A25. Date
A26. Printed Name of License Transferor/Assignor (If different than licensee. Must agree with A10)	A27. Signature	A28. Title (Office Held by Person Signing)	A29. Date
A30. Printed Name of License Transferee/Assignee (Must agree with A15)	A31. Signature	A32. Title (Office Held by Person Signing)	A33. Date

**FEDERAL COMMUNICATIONS COMMISSION
SATELLITE EARTH STATION AUTHORIZATIONS
FCC Form 312 - Schedule B: (Technical and Operational Description)**

If VSAT Network, provide the SITE-ID (Item B1b) of the station that B8-B13 are in response to (HUB, REMOTE1, etc.): _____

B8. If the proposed antenna(s) operate in the Fixed Satellite Service (FSS) with geostationary satellites, do(es) the proposed antenna(s) comply with the antenna gain patterns specified in Section 25.209(a) and (b) as demonstrated by the manufacturer's qualification measurements? If NO, provide as an exhibit, a technical analysis showing compliance with two-degree spacing policy.	<input type="checkbox"/> YES	<input type="checkbox"/> NO												
B9. If the proposed antenna(s) do not operate in the Fixed Satellite Service (FSS), or if they operate in the Fixed Satellite Service (FSS) with non-geostationary satellites, do(es) the proposed antenna(s) comply with the antenna gain patterns specified in Section 25.209(a2) and (b) as demonstrated by the manufacturer's qualification measurements?	<input type="checkbox"/> YES	<input type="checkbox"/> NO												
B10. Is the facility operated by remote control? If YES, provide the location and telephone number of the control point.	<input type="checkbox"/> YES	<input type="checkbox"/> NO												
Remote Control Point Location:														
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td colspan="4" style="padding: 2px;">B10a. Street Address</td> </tr> <tr> <td style="width:30%; padding: 2px;">B10b. City</td> <td style="width:20%; padding: 2px;">B10c. County</td> <td style="width:20%; padding: 2px;">B10d. State / Country</td> <td style="width:30%; padding: 2px;">B10e. Zip Code</td> </tr> <tr> <td colspan="2" style="padding: 2px;">B10f. Telephone Number</td> <td colspan="2" style="padding: 2px;">B10g. Call Sign of Control Station (if appropriate)</td> </tr> </table>			B10a. Street Address				B10b. City	B10c. County	B10d. State / Country	B10e. Zip Code	B10f. Telephone Number		B10g. Call Sign of Control Station (if appropriate)	
B10a. Street Address														
B10b. City	B10c. County	B10d. State / Country	B10e. Zip Code											
B10f. Telephone Number		B10g. Call Sign of Control Station (if appropriate)												
B11. Is frequency coordination required? If YES, attach a frequency coordination report as an exhibit.	<input type="checkbox"/> YES	<input type="checkbox"/> NO												
B12. Is coordination with another country required? If YES, attach the name of the country(ies) and plot of coordination contours as an exhibit.	<input type="checkbox"/> YES	<input type="checkbox"/> NO												
B13. FAA Notification - (See 47 CFR Part 17 and 47 CFR Part 25.113(c)) Where FAA notification is required, have you attached a copy of a completed FCC Form 854 and/or the FAA's study regarding the potential hazard of the structure to aviation? FAILURE TO COMPLY WITH 47 CFR PARTS 17 AND 25 WILL RESULT IN THE RETURN OF THIS APPLICATION.	<input type="checkbox"/> YES	<input type="checkbox"/> NO												

Spacecom Petition for Declaratory Ruling
To Add AMOS-2 to the Permitted
Space Stations List

Attachment A

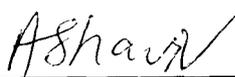
S2593 SAT-PDR-20020823-00161
Spacecom Satellite Communications Services S.C.C. LI

ATTACHMENT A

SECTION 25.114(c) TECHNICAL INFORMATION

ENGINEERING CERTIFICATION

I hereby certify that I am the technically qualified person responsible for preparation of the engineering information contained in this Petition and its attachments, that I am familiar with Part 25 of the Commission's rules, that I have reviewed the engineering information submitted in this Petition, and that it is complete and accurate to the best of my knowledge and belief.



Avi Shaviv
Technical Manager
Spacecom Satellite
Communications Services SCC
Ltd.

Date: Aug 14, 2002

**SECTION 25.114(c) INFORMATION
FOR THE AMOS-2 SPACE STATION**

(1) Name, address, and telephone number of the applicant:

Spacecom Satellite Communications Services S.C.C. Ltd.
Twin Towers I
33 Jabotinsky Street
Ramat Gan 52511
Israel
Tel: 011-972-3-6134720
Fax: 011-972-3-6134723

(2) Name, address, and telephone number of the person(s), including counsel, to whom inquiries or correspondence should be directed:

Counsel for Spacecom Satellite Communications Services SCC Ltd.
Benjamin J. Griffin
Christopher R. Bjornson
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.
701 Pennsylvania Avenue, N.W.
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Washington, D.C. 20004
(202) 434-7300
(202) 434-7400 (fax)

(3) Type of authorization requested (e.g., launch authority, station license, modification of authorization):

Spacecom requests that the Commission add the AMOS-2 satellite to the "Permitted Space Station List" created by the Commission in Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States, IB Docket No. 96-111, First Order on Reconsideration, FCC 99-325, 15 FCC Rcd 7207 (rel. Oct. 29, 1999).

The AMOS-2 satellite will be launched in early 2003 and will be operated at the 4.0° W.L. orbital location where Spacecom is currently providing services within Israel using Ku-band transponders on the AMOS-1 satellite. In addition to

ensuring continuity of these services, the AMOS-2 satellite will provide capacity for transatlantic communications services as a complement to capacity available from AMOS-1's 4.0° W.L. orbital location.

(4) General description of overall system facilities, operations and services:

Spacecom is currently operating the AMOS-1 satellite located at 4° W.L. AMOS-1 was developed and manufactured by Israel Aircraft Industry (IAI) and was launched in May 1996. AMOS-1 has two beams covering the Middle-East and Europe. AMOS-2 will be co-located with Amos-1 at 4° W.L, used to provide a wide range of telecommunication services, such as: DBS/DTH, TV& Audio distribution, High speed/two-way Internet access, Broadband communication services and VSAT networks. AMOS-2 will not be used to provide DBS/DTH services in the United States.

(5) (a) Radio Frequencies and polarization plan (including beacon, telemetry and telecommand functions):

The frequency and polarization plan of AMOS-2 satellite is shown in Annex 1. The antenna polarization will be linear. The two orthogonal polarizations are denoted as X and Y. The reference X polarization is defined as that polarization whose plane makes an angle of 90° in anti-clockwise direction, looking towards the earth, about a reference vector with respect to a plane containing this vector and the satellite pitch axis (Y axis in the satellite coordinate system). The reference vector will be the antenna focal axis and be pointed to a location, to be selected, within European or Middle-Eastern coverage. The Y polarization is defined as polarization whose plane contains the reference vector and is orthogonal to the X polarization plane. (In Annex 1: Pol. H =X; Pol. V= Y). In the Middle-East beam, 5 transmission channels will be able to operate in both polarizations in the D/L, while two receive channels will be able to operate in both polarizations in the U/L. In the NA beam, U/L and D/L will operate in H Pol.

The following frequencies will be used for the telecommand and telemetry functions :

Telecommand: 14249.0 MHz or 14251.0 MHz . Polarization V or H .

Telemetry: 11200.0 MHz or 10949.0MHz . Polarization LHCP or RHCP.

(b) Center frequency and polarization of transponders (both receiving and transmitting frequencies); transponder bandwidth:

The receive and transmit center frequencies are shown in Annex 2.

The bandwidth of each transponder is 72MHz.

(c) Emission designators and allocated bandwidth of emission:

Emission Designators: 16K0G1D → 72M0G1D

16K0G1W → 72M0G1W

18M0F3F → 36M0F3F

Allocated Bandwidth: 16KHz to 72 MHz.

(d) Identification of which antenna beams are connected or switchable to each transponder and TT&C function:

The AMOS-2 satellite will use fixed receive and transmit beams over Europe, Middle-East and North-America.

Coverage maps are presented in Annex 3.

The connectivity of each and every channel and beam is presented in the table of Annex 2.

Up to 11 channels will be assigned to the Middle-East beam (channels 11 to 21). Two channels (14 & 15) will be able to operate in both polarizations (V or H), in the up-link and in the down-link, while three other channels (19,20,21) will be able to operate in both polarizations in the down-link only.

Up to 6 channels will be assigned to the European beam (channels 22 to 27). There will be no operational constraints for channels using the same frequencies in Europe and the Middle-East.

Channels 20, 21 in the Middle-East beam and channels 26, 27 in the European beam will be able to be cross-connected simultaneously in both directions.

Up to 8 channels can be up-linked from the North-America service area, to be down-linked to the Middle-East service area (11,12,13,17,18,19,20,21) and/or to the European service area (22-27).

Up to two channels (19,20) can be up-linked from the ME to be down-linked to NA (channels 28,29).

One channel will be shared between the ME beam (21) and Europe (27) to also be down-linked to NA (30) (e.g., the lower half channel will be allocated to the ME while the upper half channel to Europe), in this application the receive G/T will be decreased by 3dB.

The following tables summarize the channel allocation options:

Middle East				Europe	NA
U/L (H)	U/L (V)	D/L (H)	D/L (V)	D/L (H)	D/L (H)
11			11		
12			12		
13			13		
	14	14			
	15	15			
14'			14		
15'			15		
16			16		
17			17		
18			18		
	19	19	19		28
	20	20	20	26	29
	21	21	21	27	30

Europe		ME		NA
U/L (V)	D/L (H)	D/L (H)	D/L (V)	D/L (H)
22	22			
23	23			
24	24			
25	25			
26	26	20		
27	27	21		30

NA	ME		EUROPE
U/L (H)	D/L (H)	D/L (V)	D/L (H)
111/122		11	22
112/123		12	23
113/124		13	24
117		17	
118		18	
119/125	19		25
120/126	20		26
121/127	21		27

- (e) **Final amplifier output power (identify any net losses between output of final amplifier and input of antenna and specify the maximum EIRP for each antenna beam):**

All the TWTA's used in the Amos2 payload have 75W saturated output power (18.75 dBW).

Net loss between TWTA's output and input of antenna is 1.4dB (a representative figure of channel #11, including: W/G, switches and OMUX loss).

Maximum saturated EIRP for each beam is listed below :

<i>Beam</i>	<i>ME-V</i>	<i>ME-H</i>	<i>EU-H</i>	<i>NA-H</i>
<i>EIRP</i> <i>[dBW]</i>	57.5	57.2	56.5	53.2

ME-V : Middle-East Vertical

ME-H : Middle-East Horizontal

EU-H : Europe Horizontal

NA-H : North-America Horizontal

EIRP coverage maps of the various beams are presented in annex 3 .

(f) Receiving system noise temperature:

Maximum receiving system noise temperature is 27.2dBK (525°K) , with each receive antenna ($T_{ant} = 271$ °K).

(g) Relationship between satellite receive antenna gain pattern and gain-to-temperature ratio and saturation flux density for each antenna beam (may be indicated on antenna gain plot):

Saturation Flux Densities for the different receive beams are presented in the following table:

<i>Beam</i>	<i>SFD @ Min. Gain Setting [dBW/m²]</i>	<i>SFD @ Max. Gain Setting [dBW/m²]</i>
<i>ME-H</i>	-65.3-G/T	-90.3-G/T
<i>ME-V</i>	-64.7-G/T	-89.7-G/T
<i>EU-V</i>	-65.3-G/T	-90.3-G/T
<i>NA-H</i>	-64.8-G/T	-89.8-G/T

G/T coverage maps of the various beams are presented in annex 3.

(h) Gain of each transponder channel (between output of receiving antenna and input of transmitting antenna) including any adjustable gain step capabilities:

The gain of each transponder channel, between output of receiving antenna and input of transmitting antenna, will be adjustable in steps of 1.0dB \pm 0.3 dB (total of 25dB),

Min. Gain	100.7 dB
Max. Gain	125.7 dB

(i) **Predicted receiver and transmitter channel filter response characteristics:**

- Predicted channel filter out-of-band response characteristics
(Between receive antenna output and TWT):

<i>Offset frequency</i>			
<i>CF ± MHz</i>	47	51	60
<i>Rejection [dB]</i>	28	33	45

- Predicted OMUX channel filter out-of-band response characteristics
(Between TWTA output and antenna input):

<i>Offset frequency</i>			
<i>CF ± MHz</i>	47	51	60
<i>Rejection [dB]</i>	15	16	25

(6) **For satellites in geostationary-satellite orbit, orbital location or locations:**

The AMOS-2 satellite will be operated at the 4.0° W.L. orbital location.
(Co-located with Amos1 satellite).

(7) **Predicted space station antenna gain contour(s) for each transmit and each receive antenna beam and orbital location, plotted on an area map at 2dB intervals down to 10 dB below the peak value of the parameter and at 5 dB intervals between 10 dB and 20 dB below the peak values, with the peak value and sense of polarization clearly specified on each plotted contour:**

Antenna gain contours are presented in annex 4:

European beam Tx & Rx

ME beam Tx&Rx

NA beam Tx&Rx

(8) (a) **Description of the types of services to be provide, and the areas to be served:**

- The Amos-2 satellite will serve the following service areas:
(See detailed coverage maps)

<i>Beam</i>	<i>Countries</i>
<i>Middle-East</i>	Israel, Egypt, Jordan, Syria, Kuwait, Lebanon, Cyprus, Turkey, Iraq, Iran
<i>Europe</i>	Hungary, Ukraine, Bulgaria, Romania, Poland, Croatia, Serbia, Bosnia, Albania, Greece, Turkey, Czeck Republic, Lithuania, Latvia, Austria, France, England, Russia, Germany.
<i>East-Coast US and Canada</i>	NYC, Boston, Montreal (AMOS-2 will not provide DBS, DTH or DARS services to these service areas).

- Types of services to be provided in the Middle East and Europe are summarized below:

<i>Analog</i>	<ul style="list-style-type: none"> • FMTV (w/ multiple audio S/C) - SNG, Point to Point, Distribution and Contribution. • SCPC/FM
<i>Digital</i>	<ul style="list-style-type: none"> • Direct to Home (Digital Video and Internet applications) • Direct Broadcasting Service • Digital Audio Radio service • Point to Point data services • Data Transactions (VSAT Networks)

(b) Description of the transmission characteristics and performance objectives for each type of proposed service:

The following tables summarize the various transmission characteristics and performance objectives for the different service types:

1. DBS/DTH, Video distribution, DSNG etc. based on DVB-S and DVB-DSNG standards (EN300-421 and EN 301-210):

<u>Modulation</u>	<u>FEC</u>	<u>Spectral Efficiency</u>	<u>Eb/No @ QEF</u> [dB]	<u>Eb/No @ QEF (Satellite Loop)</u> [dB]
QPSK	1/2	1.08511	4.5	5.0
	2/3	0.81383	5.0	5.5
	3/4	0.72340	5.5	6.0
	5/6	0.65106	6.0	6.5
	7/8	0.62006	6.4	6.9
8PSK	2/3	0.54255	6.9	7.9
	5/6	0.43404	8.9	9.9
	8/9	0.40691	9.4	10.4
16QAM	3/4	0.36170	9.0	10.5
	7/8	0.31003	10.7	12.2

2. Digital Point-to-Point data services, Data Transactions (VSAT Networks)

QPSK / Viterbi		Eb/No [dB] Specification		
BER		R1/2	R3/4	R7/8
1.0E-03		4.2	5.2	6.4
1.0E-04		4.8	6.0	7.2
1.0E-05		5.5	6.7	7.9
1.0E-06		6.1	7.5	8.6
1.0E-07		6.7	8.2	9.2
1.0E-08		7.2	8.8	9.9

QPSK / Viterbi +RS			
BER	Eb/No [dB] Specification		
	R1/2	R3/4	R7/8
1.0E-06	4.1	5.6	6.7
1.0E-07	4.2	5.8	6.9
1.0E-08	4.4	6.0	7.1
1.0E-10	5.0	6.3	7.5

QPSK / Sequential (56Kbps)			
BER	Eb/No [dB] Specification		
	R1/2	R3/4	R7/8
1.0E-03		4.6	5.5
1.0E-04	4.1	5.1	6.1
1.0E-05	4.5	5.5	6.6
1.0E-06	5.0	5.9	7.3
1.0E-07	5.4	6.4	7.8
1.0E-08	5.8	6.8	8.4

8PSK		
BER	Eb/No [dB] Specification	
	R2/3 (+RS)	R2/3
1.0E-06	6.1	8.7
1.0E-07	6.4	9.5
1.0E-08	6.6	10.2
1.0E-09	6.9	11.0
1.0E-10	7.2	11.8

<i>OQPSK /</i>				
<i>Viterbi</i>		<u>Eb/No [dB] Specification</u>		
BER	R1/2	R3/4	R7/8	
1.0E-03	4.1	5.2	6.4	
1.0E-04	4.9	6.0	7.2	
1.0E-05	5.6	6.7	7.9	
1.0E-06	6.3	7.5	8.6	
1.0E-07	6.9	8.2	9.2	
1.0E-08	7.5	8.8	9.9	

<i>BPSK, QPSK, OQPSK /</i>				
<i>Uncoded</i>		<u>Eb/No [dB] Specification</u>		
BER	R1/1			
1.0E-03	8.8			
1.0E-04	9.6			
1.0E-05	10.8			
1.0E-06	11.6			
1.0E-07	12.4			

3. Analog FMTV, Deviation 6.4MHz (Video only), 7 MHz (Video+Audio)
 Total BW 30-36 MHz
 Threshold C/N ~ 7 dB

(c) Details of the link noise budget:

See Link Calculations (Annex 5)

(d) Typical or baseline earth station parameters:

Transmit Earth-Stations:

<i>Beam</i>	<i>Minimum Antenna Diameter</i>	<i>Off Axis Gain Pattern</i>
<i>Middle-East</i>	0.6m	
<i>Europe</i>	0.6m	ITU Rec BO1213
<i>East-Coast US</i>	4.5m	

Receive Earth-Stations:

<i>Beam</i>	<i>Minimum Antenna Diameter</i>	<i>Off Axis Gain Pattern</i>
<i>Middle-East</i>	0.6m	
<i>Europe</i>	0.6m	ITU Rec BO1213
<i>East-Coast US</i>	2.4m	

(e) Modulation parameters:

See paragraph 8(b) above

(f) Overall link performance analysis (including an analysis of the effects of each contributing noise and interference source):

See Link Calculations (Annex 5)

- (9) **For satellites in geostationary-satellite orbit, accuracy with which the orbital inclination, the antenna axis attitude, and longitudinal drift will be maintained:**

AMOS-2 satellite will be maintained at 4°W.L with a longitudinal accuracy of 0.05°.

Its orbital inclination will be maintained within $\pm 0.405^\circ$.

Antenna axis stability: 0.15°

- (10) **Calculation of power flux density levels within each coverage area and of the energy dispersal, if any for compliance with Sec. 25.208:**

<i>Coverage Area</i>	<i>Maximum Power Flux Density</i>
<i>Middle-East</i>	-148dBW/m ² .4KHz
<i>Europe</i>	-149dBW/m ² .4KHz
<i>East-Coast US</i>	-152dBW/m ² .4KHz

The above power densities are calculated for saturated transponder EIRP-operating point which will never be implemented (maximum is -2dB back-off) .

- (11) **Arrangement for tracking, telemetry, and control:**

TTC functions will be performed using Earth-station located at MBT (Yehud,Israel) : Longitude 34.90445° E ; Latitude 32.02692° N .

- (12) **Physical characteristics of the space station including weight and dimensions of spacecraft, detailed mass (on ground and in-orbit) and power (beginning and end of life) budgets, and estimated operational lifetime and reliability of the space station and the basis for that estimate:**

Physical characteristics of the AMOS-2 satellite:

Dimensions:	2.4 x 2.3 x 2.5 m
Solar panels in deployed configuration:	~ 11 m
Mass on ground ("dry")	640 kg.
At launch	1,360 kg.
Power beginning of life	2,400 W
End of life	1,850 W
Estimated operational lifetime	11.5 years
Reliability	0.7 for 11.5 year lifetime

- (13) **Detailed information demonstrating the financial qualifications of the applicant to construct and launch the proposed satellites. Applications shall provide the financial information required by Sec. 25.140(b) through (e), Sec. 25.142(a)(4), or Sec. 25.143(b)(3), as appropriate:**

Information demonstrating the financial qualifications of Spacecom is supplied separately as Attachment B.

- (14) **Clear and detailed statement of whether the space station is to be operated on a common carrier basis, or whether non-common carrier transactions are proposed. If non-common carrier transactions are proposed, describe the nature of the transactions and specify the number of transponder to be offered on a non-common carrier basis:**

The AMOS-2 satellite will be operated on a non-common carrier basis and all transponders will be available for use on a non-common carrier basis. Spacecom will lease capacity pursuant to commercial contracts.

It is not Spacecom's customary practice to hold itself out as a common carrier for hire, and Spacecom does not intend to make capacity available on a common carrier basis.

(15) Dates by which construction will be commenced and completed, launch date, and estimated date of placement into service:

The AMOS-2 satellite is under construction. Its construction will be completed by the end of 2002. Its launch is scheduled for early 2003 for a placement into service within thirty days after launch.

(16) Public interest considerations in support of grant:

The AMOS-2 satellite will provide an additional source of capacity for authorized digital transmission services (including video and Internet services) between the United States, Europe and the Middle East.

The entry of the AMOS-2 satellite into the market to meet customers' demand for such services will enhance competition in that market. Accordingly, the grant of this application is in the public interest.

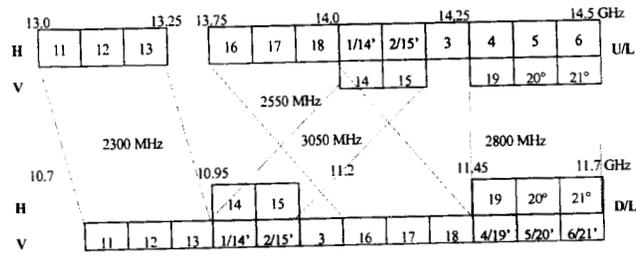
The attached Petition for Declaratory Ruling also contains reasoning as to why the grant is in the public interest.

Annex 1

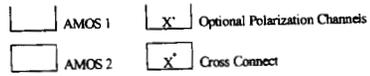
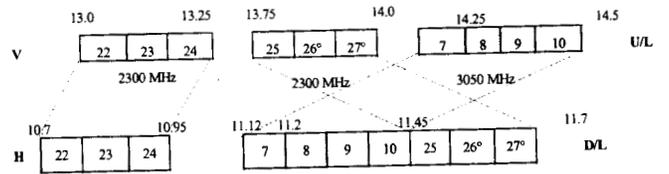
Frequency Plan

AMOS-2 Frequency Plan

Middle East Beam

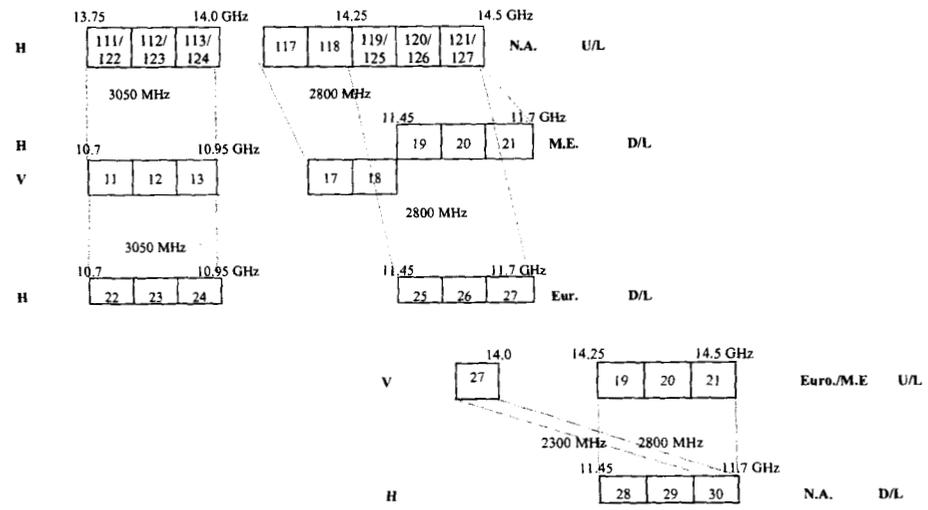


European Beam



AMOS-2 Frequency Plan

North America Beam



Annex 2

Center Frequencies

&

Transponder Bandwidths

Channels	Up-Link from	Center Freq. BW=72MHz	Down-Link to	Channels	Center Freq. BW=72MHz
11, 12, 13	Middle East	13040.5, 13124, 13207.5	Middle East	11, 12, 13	10740.5, 10824, 10907.5
14, 15	Middle East	14040.5, 14124	Middle East	14, 15	10990.5, 11074
16, 17, 18	Middle East	13790, 13873.5, 13957	Middle East	16, 17, 18	11240, 11323.5, 11407
19, 20, 21	Middle East	14292.5, 14376, 14459.5	Middle East	19, 20, 21	11492.5, 11576, 11659.5
20, 21	Middle East	14376, 14459.5	Europe	26, 27	11576, 11659.5
19, 20, 21	Middle East	14292.5, 14376, 14459.5	North America	28, 29, 30	11492.5, 11576, 11659.5
22, 23, 24	Europe	13040.5, 13124, 13207.5	Europe	22, 23, 24	10740.5, 10824, 10907.5
25, 26, 27	Europe	13792.5, 13876, 13959.5	Europe	25, 26, 27	11492.5, 11576, 11659.5
26, 27	Europe	13876, 13959.5	Middle East	20, 21	11576, 11659.5
27	Europe	13959.5	North America	30	11659.5
111, 112, 113	North America	13790.5, 13874, 13957.5	Middle East	11, 12, 13	10740.5, 10824, 10907.5
122, 123, 124, 125	North America	13790.5, 13874, 13957.5, 14292.5	Europe	22, 23, 24, 25	1074.5, 10824, 10907.5, 11492.5
117, 118	North America	14123.5, 14207	Middle East	17, 18	11323.5, 11407
119, 120, 121	North America	14292.5, 14376, 14459.5	Middle East	19, 20, 21	11492.5, 11576, 11659.5
126, 127	North America	14376, 14459.5	Europe	26, 27	11576, 11659.5
19, 20, 21	Middle East & Europe	14292.5, 14376, 14459.5	North America	28, 29, 30	11492.5, 11576, 11659.5

Annex 3

G/T and EIRP

Coverage Maps

Insert after this page the following maps from the file "Amos 2 – payload performance.pdf":

Pages 2-19, 2-22, 2-26, 2-29, 2-30, 2-31, 2-35, 2-38, 2-42, 2-43.

Annex 4

Antenna Gain Contours
(Tx & Rx)

Insert after this page the following maps from the file "Antenna Gain Contours.pdf":

Pages 03-2, 03-3, 03-4, 03-5, 03-6, 03-7, 03-9, 03-10.

Annex 5

Link Calculations

Amos 2- Sample Link Calculation

Satellite: Amos2
Transponder 21/30 (Cross-Connect)
Uplink: Jerusalem
DownLink: NYC
Project : FCC Amos2 sample Link Calculation

Satellite Parameters			Link Parameters		
EIRPav	[dBW]	0	Mod. Type (BPSK=1,QPSK=2)		2
Input Back Off	[dB]	-4.5	Bit Rate	[Kb/s]	36863.0
Output Back Off	[dB]	-2.0	FEC (0.5 for 1/2,etc)	3/4+RS	0.691
SFD	[dB/m^2]	-88.7	Overhead	[%]	0.0
(G/T)s	[dB/k]	15.0	Transmitter		
Up Frequency	[GHz]	14.500	Dt	[meter]	4.60
Down Frequency	[GHz]	11.700	Efficiency	[%]	65.0
(C/Io) total	[dB-Hz]	99.0	Pt	[Watt]	15.70
Satellite parameters are based on : Satellite specifications			Off Beam Loss	[dB]	0.0
			Output circuit loss	[dB]	0.5
			Pointing/Tracking Loss	[dB]	0.5
			Other losses	[dB]	0.0
			Uplink Fade Margin	[dB]	0.0
			Receiver		
			Dr	[meter]	4.60
			Efficiency	[%]	65.0
			LNB-Noise Temperature	[K]	85.0
			Elevation angle	[deg]	6.5
			Off Beam Loss	[dB]	0.0
			Pointing/Tracking Loss	[dB]	0.5
			Loss between LNB & Ant	[dB]	0.2
			Downlink Fade Margin	[dB]	0.0

Link Calculations Results

<u>(Eb/No)up =</u>	26.6 [dB]	<u>Transmission Rate</u>	53333.7 [Kbps]
<u>(Eb/No)down =</u>	24.8 [dB]	<u>Symbol Rate</u>	26666.9 [Ksps]
		Satellite EIRP	47 [dBW]
<u>(Eb/No)total=</u>	19.9 [dB]	<u>Allocated Bandwidth</u>	36000.2 [KHz]

Amos 2- Sample Link Calculation

Satellite: Amos2
Transponder 111/11 (Cross-Connect)
Uplink: NYC
DownLink: Jerusalem
Project : FCC Amos2 sample Link Calculation

<u>Satellite Parameters</u>			<u>Link Parameters</u>		
EIRPav	[dBW]	56.0	Mod. Type (BPSK=1,QPSK=2)		2
Input Back Off	[dB]	-4.5	Bit Rate	[Kb/s]	36863.0
Output Back Off	[dB]	-2.0	FEC (0.5 for 1/2,etc)	3/4+RS	0.691
SFD	[dB/m^2]	-88.7	Overhead	[%]	0.0
(G/T)s	[dB/k]	15.0			(DVB)
Up Frequency	[GHz]	14.500	<u>Transmitter</u>		
Down Frequency	[GHz]	11.700	Dt	[meter]	4.60
			Efficiency	[%]	65.0
			Pt	[Watt]	27.91
(C/lo) total	[dB-Hz]	99.0	Off Beam Loss	[dB]	0.0
Satellite parameters are based on :			Output circuit loss	[dB]	3.0
Satellite specifications			Pointing/Tracking Loss	[dB]	0.5
			Other losses	[dB]	0.0
			Uplink Fade Margin	[dB]	0.0
			<u>Receiver</u>		
			Dr	[meter]	0.80
			Efficiency	[%]	65.0
			LNB-Noise Temperature	[K]	85.0
			Elevation angle	[deg]	6.5
			Off Beam Loss	[dB]	0.0
			Pointing/Tracking Loss	[dB]	0.5
			Loss between LNB & Ant	[dB]	0.2
			Downlink Fade Margin	[dB]	0.0

Link Calculations Results

<u>(Eb/No)up =</u>	26.6 [dB]	<u>Transmission Rate</u>	53333.7 [Kbps]
<u>(Eb/No)down =</u>	13.6 [dB]	<u>Symbol Rate</u>	26666.9 [Ksps]
<u>(Eb/No)total=</u>	12.9 [dB]	Satellite EIRP	51 [dBW]
		<u>Allocated Bandwidth</u>	36000.2 [KHz]

Spacecom Petition for Declaratory Ruling
To Add AMOS-2 to the Permitted
Space Stations List

Attachment B

ATTACHMENT B

SECTION 25.140 FINANCIAL INFORMATION



CERTIFICATION FINANCIAL INFORMATION

I hereby declare under penalty of perjury under the laws of the United States of America that the attached information is true and correct.

Executed on August 17, 2002 in **Ramat Gan, Israel**

**Itzhak Shnaiberg
VP Finance
Spacecom Satellite
Communications Services SCC
Ltd.**

Spacecom Ltd.

Twin tower 1, Suite 1017, 33 Jabotinsky St., Ramat Gan 52511, Israel.
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www.spacecom.co.il

**SECTION 25.140(b) & (c) INFORMATION
FOR THE AMOS-2 SPACE STATION**

Section 25.140(b)(3) and (4)

Estimated costs of construction, launch, launch insurance and operating expenses for one year after launch of the space station: \$136 million

Section 25.140(c)(1)

Balance sheet current for the latest fiscal year: See attachment.

Exhibit demonstrating that the applicant has current assets and operating income sufficient to meet the costs specified in paragraphs (b)(3) and (b)(4):

The project is financed by Publicly Traded Bonds, Banks Credit, Vendor and Shareholders Equity totaling \$157M. The attached balance sheet reflects the financing sources for the project except for credit extended by banks. These credit lines account for more than \$100 million of the potential financing for the project.

Profit and Loss summary report – see attachment.

SPACECOM SATELLITE COMMUNICATION SERVICES S.C.C. LTD.

Balance Sheets

<u>December 31</u> <u>2000</u> KUSd	<u>December 31</u> <u>2001</u> KUSd
160	58,956
2,250	3,481
2,411	62,437
330	574
267	1,647
250	596
23,017	2,155
23,533	4,398
26,274	67,409
14,811	16,229
356	27,290
---	10,250
404	611
15,572	54,381
---	2,921
1,456	763
246	164
1,701	3,848
9,001	9,180
26,274	67,409

ASSETS

FIXED ASSETS

Assets under construction (satellite)

Other assets

TOTAL FIXED ASSETS

LONG TERM RECEIVABLE

CURRENT ASSETS

Other receivables

Trade receivables

Cash and cash equivalents

TOTAL CURRENT ASSETS

TOTAL ASSETS

LIABILITIES

LONG TERM LIABILITIES

Bonds

loans

Vendors' financing

Interested parties and others liabilities

TOTAL LONG TERM LIABILITIES

CURRENT LIABILITIES

Interested parties

Trade and checks payables

Current maturities of long term loans

TOTAL CURRENT LIABILITIES

SHAREHOLDERS' EQUITY

TOTAL LIABILITIES

SPACEOPM SATTELITE COMMUNICATION SERVICES S.C.C. LTD.

Statements of Operations

<u>For the year ended</u> <u>December 31</u> <u>2000</u> KUSd	<u>For the year ended</u> <u>December 31</u> <u>2001</u> KUSd	
		REVNEUES
		Marketing commissions
		Up link services
		Up link services- operation and maintenance
		Gross profit
		Marketing expenses
		General and administrative expenses
		Income from opraition
		Financing expenses, net
		NET INCOME FOR THE YEAR
937	1,187	
418	437	
<u>1,355</u>	<u>1,624</u>	
228	213	
1,127	1,411	
165	318	
449	554	
<u>614</u>	<u>872</u>	
513	539	
268	271	
<u>244</u>	<u>268</u>	

Spacecom Petition for Declaratory Ruling
To Add AMOS-2 to the Permitted
Space Stations List

Attachment C

ATTACHMENT C
FOREIGN OWNERSHIP INFORMATION

FOREIGN OWNERSHIP INFORMATION

Question 34 Information

Ownership interests in Spacecom Satellite Communications Services S.C.C. Ltd. ("Spacecom") are held by the following entities with percentage interests indicated: Israel Aircraft Industries (24.25%), Eurocom Holdings (1979) Ltd. (24.25%), General Satellite Services Co. Ltd. (24.25%) and Mer Services Group Ltd. (24.25%).

These entities are all corporations organized under the laws of Israel.

The remaining 3% of the company's shares are beneficially held by Spacecom's CEO, Mr. David Pollack, an Israeli citizen.

Commission Policy to Foreign Ownership as Applied to Spacecom's Application

In questions 31 and 32, Spacecom identifies itself as a corporation organized under the laws of a foreign government. However, this Petition for Declaratory Ruling seeks only to permit U.S.-licensed ALSAT earth stations to access AMOS-2, a non-U.S. satellite, consistent with the *DISCO II Reconsideration Order*.^{1/} Thus, Spacecom's foreign ownership poses no U.S. licensing concerns.

In any event, in the *DISCO II Order*, the Commission essentially created a blanket waiver of alien ownership restrictions by adopting "a rebuttable presumption that applications by investors from WTO Member countries to exceed the 25 percent foreign ownership limitation under Section 310(b)(4) will promote competition."^{2/} Accordingly,

^{1/} Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States, IB Docket No. 96-111, *First Order on Reconsideration*, FCC 99-325, 15 FCC Rcd 7207 (rel. Oct. 29, 1999).

^{2/} Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States, IB Docket No. 96-111, *Report and Order*, FCC 97-399, 12 FCC Rcd 24094, 24159 (rel. Nov. 26, 1997).

Spacecom's Petition for Declaratory Ruling raises no foreign ownership concerns and should be granted.

WDC 316606v1